

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

| | | |
|--------------------------|---|--------------------------|
| IN RE: |) | |
| RUSSELL A. BROOKS |) | Case No. 15-80927 |
| SSN:xxx-xx-0397 |) | Chapter 13 |
| ALISHA D. BROOKS |) | |
| SSN:xxx-xx-9754 |) | |
| |) | |
| Debtor(s). |) | |

MOTION TO MODIFY PLAN

Comes now the Trustee and for his Motion to Modify Plan after confirmation, states:

1. The Debtors confirmed plan provides to pay the continuing mortgage, pre-petition arrears and post-petition arrears to American Financial Resources, and to pay the secured claim of Ford Motor Credit for a 2006 Ford Escape.
2. The bar date for filing claims was January 6, 2016, and neither American Financial Resources nor Ford Motor Credit filed claims in this case.
3. The Trustee proposes to modify the plan, to remove the payment to Ford Motor Credit, and the pre-petition and post-petition arrears of American Financial Resources. The Trustee will begin paying the continuing mortgage to American Financial Resources in month 6.
4. As a result, the Trustee requests this Court to Modify the Plan to allow him to make the following changes and/or increase funds to unsecured creditors:

| Creditor | Collateral | Description of Change |
|------------------------------|-----------------------------|--------------------------|
| Ford Motor Credit | 2006 Ford Escape | No payments will be made |
| American Financial Resources | Pre & Post-petition arrears | No payments will be made |

Wherefore the Trustee requests the Court to enter an Order Allowing the Trustee to Modify the Debtor(s) Plan Post-Confirmation.

Respectfully submitted,

/s/ William M. Bonney
William M. Bonney
Standing Chapter 13 Trustee
215 State Street, Suite 1000
P.O. Box 1548
Muskogee, OK 74402-1548
Phone: (918) 683-3840